



WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

January 26, 2017

Susan Von Zabern, Director
Riverside County Department of Public Social Services
4060 County Circle Drive
Riverside, CA 92503

Dear Ms. Von Zabern:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of September 19 to September 23, 2016. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Jaime Urquizo at (916) 654-2101. You may also contact him by e-mail at james.urquizo@dss.ca.gov

Sincerely,

Original signed by James Tashima

JAMES TASHIMA, Chief
Civil Rights Unit
Welfare to Work Division

Enclosure

c: Nancy Chung, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Jacqueline Hom
Refugee Programs Bureau

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Andrew Riesenbergl
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
RIVERSIDE COUNTY DEPARTMENT OF
PUBLIC SOCIAL SERVICES
Conducted on
September 19, 2016 to September 23, 2016**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814
(916) 654-2107**

Reviewer: Jaime Urquizo

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- X. COMMUNITY INPUT**
- XI. CONCLUSION**

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Riverside County Department of Public Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on September 19 to September 23, 2016. An exit interview was held on September 23, 2016, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Riverside Admin	10281 Kidd Street, Riverside CA	Vendor Contracts	English, Spanish
Riverside Call Center	2300 Market Street, Riverside, CA	Call Center	English, Spanish
Desert Hot Springs	14201 Palm Drive, Desert Hot Springs, CA	Welfare to Work	English, Spanish
Perris Office	2055 N. Perris Blvd., Perris, CA	Children's Services	English, Spanish
Moreno Valley Office	12625 Heacock, Moreno Valley, CA	CalWorks, Calfresh	English, Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2016 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Information from community advocate groups.

In this review the following organization(s) were contacted for feedback.

- Murillo Maria-Family Services Association
21250 Box Springs Rd #106
Moreno Valley, CA 92557-8700
- Inland Caregiver Resource Center
1420 E. Cooley Drive #100
Colton, CA 92324-3933

NOTE: These organizations did not have any observations.

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Children Social Workers	9	9
Receptionist/Screeners	4	3
Welfare to Work Workers	8	8
Calfresh / Calworks Workers	9	9
Total	30	29

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

Languages of clients' cases (English, Spanish)	Welfare to Work	Children Services	Calfresh-Calworks	TOTAL
English speakers' case files reviewed	2	2	2	6
Non-English or limited-English speakers' case files reviewed	28	28	28	84

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval. Section X highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	yes			
Does the county have extended hours to accommodate clients?	yes			
Can applicants access services when they cannot go to the office?	yes			Online Services available and call centers
Does the county ensure the awareness of available services for individuals in remote areas?	yes			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	yes			
Is the pamphlet distributed and explained to each client at intake	yes			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
and re-certification?				
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?	yes			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	yes			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	yes			
Were the current versions of the required posters present in the lobbies?	yes			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	yes			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	yes			

B. Corrective Actions

None

C. Recommendations

None

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: 10281 Kidd Street, Riverside, CA

Directional signage to accessible entrance if not main entrance?	Recommend posting a directional sign at the corner of building to direct clients to the front of the building.	Directional signs complying with "Visual Characters" heading in Section 57, Signs & Identification), including the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in
---	--	--

		<p>Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28</p>
<p>Is there unauthorized parking signage at entrance to off-street accessible parking?</p>	<p>Two (2) Unauthorized Parking Signs at entry of parking lot missing.</p>	<p>An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>
<p>Is there unauthorized parking signage at</p>	<p>One (1) Unauthorized</p>	<p>An additional sign shall be posted either in a conspicuous</p>

<p>entrance to off-street accessible parking?</p>	<p>Parking Sign at entry to parking lot (across the street) missing information (tow co, phone number)</p>	<p>place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170</p> <p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>
<p>Signage</p>	<p>Signage at Entry to Building – Hours of Operation not in Threshold language</p>	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language.</p>

		<p>(Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Signage	Children Services Division sign at lobby door is not in threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Signage	Child Protective Services upstairs sign at elevator location is not in threshold language	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max.</p>

		Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379
Elevator – Marked accessible?	Elevator does not have disabled sign displayed	Where existing elevators do not comply with this section, elevators complying with this section shall be clearly identified with the International Symbol of Accessibility complying with Section 57, Signs & Identification. (CA T24 11B-216.7) (ADA 216.7) pg. 242
Men’s Bathroom - Is there proper signage on the wall for permanent identification?	Sign at men’s bathroom door not in braille.	Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg. 311
Signage	Live Scan Room sign not in threshold language.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212) Installation height above finished floor shall be 40” max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379
Parking - Is parking located as close as possible to entrance?	Recommend a sign at parking lot across the street to direct disabled	Parking spaces complying with the requirements of this section that serve a particular building

	clients to use cross walk at corner of street.	<p>or facility shall be located on the shortest accessible route from parking to an entrance complying with "Entrances" heading in Section 5, Accessible Routes - Scoping Requirements. (CA T24 11B-208.3.1) (ADA 208.3.1) pg. 172</p> <p>Where parking serves more than one accessible entrance, parking spaces complying with the requirements of this section shall be dispersed and located on the shortest accessible route to the accessible entrances. (CA T24 11B-208.3.1) (ADA 208.3.1) pg. 172</p> <p>In parking facilities that do not serve a particular building or facility, parking spaces complying with the requirements of this section shall be located on the shortest accessible route to an accessible pedestrian entrance of the parking facility. (CA T24 11B-208.3.1) (ADA 208.3.1) pg. 172</p>
--	--	---

1a. Facility Location: 2300 Market Street, Riverside, CA

Administration building – Reviewed 10 Vendor Contracts / Visited Call Center

Vendor Contracts	Four (4) out of 10 vendor contracts did not have an Assurance of Compliance	.4 Contractor and Vendor Compliance Contractors, vendors, consultants and other
-------------------------	---	---

	<p>Certificate signed in the contract folder.</p> <p>Contract: CS - 02875</p> <p>Contract: CW -03172</p> <p>Contract: CS - 03358</p>	<p>providers of service who receive federal or state assistance through CDSS or through agencies covered by these regulations shall comply with nondiscrimination requirements of this division.</p> <p>.5 Written assurances of nondiscrimination in programs and activities receiving federal or state financial assistance shall be required.</p> <p>This requirement is fully applicable to all vendors, contractors, consultants and other providers of service in addition to county welfare departments.</p> <p>NOTE: Authority cited: Sections 10553 and 10554, Welfare and Institutions Code.</p> <p>Reference: Sections 10553 and 10554, Welfare and Institutions Code; Section 11135(b), Government Code; Title VI of the Civil</p> <p>Rights Act of 1964, P.L. 88-352; and 28 CFR 42.407.</p>
--	--	--

CALL CENTER: The Call Center displayed no potential problems. Workers accepted all calls expeditiously, professionally and informatively. The Call Center workers I spoke to were all proficient in Spanish. There was excellent support of clients on the phone.

2. Facility Location: 14201 Palm Drive, Desert Hot Springs

Signage	Signage at Entry to Building – Hours of Operation not in Threshold language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Parking - Does a ramp protrude into the access aisle?	Ramp extending into the parking access aisle from sidewalk.	<p>Access aisles shall not overlap the vehicular way. (CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p>
Signage	Document Drop off Box - Pick up Times - Is not in Threshold Language	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above</p>

		or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2) pg. 311
--	--	---

3. Facility Location: 2055 N. Perris Blvd, Perris, CA

Children's Services Division:

Facility Element	Findings	Corrective Action
Parking Directional signage to accessible entrance if not main entrance?	Directional sign needed at right corner end of the building guiding clients to main Children Services entrance.	Directional signs complying with "Visual Characters" heading in Section 57, Signs & Identification), including the International Symbol of Accessibility complying with "International Symbol of Accessibility" heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28
Signage	Signage at Entry to Building – Hours of Operation not in Threshold language.	All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)

		<p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Signage	No smoking sign wording needs to be in Threshold Language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Parking - Does a ramp protrude into the access aisle?	Parking spot to far right of building has ramp edge into access aisle by 1 foot.	<p>Access aisles shall not overlap the vehicular way. (CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p>
Parking - Is there additional signage or additional language below the symbol of accessibility "Minimum Fine \$250"?	Three (3) parking signs missing additional signage below main sign.	<p>Additional language or an additional sign below the International Symbol of Accessibility shall state "Minimum Fine \$250". (CA T24 11B-502.6.2) pg. 169</p>

<p>Front Entrance to Building - Accessible signage?</p> <p>Directional signage to accessible entrance if not main entrance.</p>	<p>ISA Disabled Signage not at front entrance to building.</p>	<p>In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways and Gates, entrances complying with Section 33, Doors, Doorways and Gates shall be identified by the International Symbol of Accessibility complying with “International Symbol of Accessibility” heading in Section 57, Signs & Identification. (CA T24 11B-216.6) (ADA 216.6) pg. 28</p> <p>Directional signs complying with “Visual Characters” heading in Section 57, Signs & Identification), including the International Symbol of Accessibility complying with “International Symbol of Accessibility” heading in Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28</p> <p>Visual characters shall be 40” min. above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376</p>
---	--	--

Family Resource Center Services:

<p>Parking - Is there additional signage or additional language below the symbol of accessibility “Minimum Fine \$250”?</p>	<p>Two (2) parking signs missing additional signage below main sign.</p>	<p>Additional language or an additional sign below the International Symbol of Accessibility shall state “Minimum Fine \$250”. (CA T24 11B-502.6.2) pg. 169</p>
<p>Signage</p>	<p>Private Property sign - Not in Threshold Language</p>	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40” max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
<p>Client Interview Rooms & Booths</p> <p>If there is signage, is the signage compliant? Signage to be 40” max</p>	<p>Family Resource Hours Sign not in threshold language.</p>	<p>Installation height above finished floor shall be 40” max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
<p>Client Interview Rooms & Booths</p> <p>If there is signage, is the signage compliant? Signage to be 40” max</p>	<p>No Disabled Training room signage designated for two (2) Training Rooms.</p>	<p>Installation height above finished floor shall be 40” max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>

Height of signage.		<p>Section 57, Signs & Identification, indicating the accessible route to the nearest accessible entrance shall be provided at junctions when the accessible route diverges from the regular circulation path. (CA T24 11B-216.6) pg. 28</p> <p>Visual characters shall be 40" min. above the finish floor or ground. (CA T24 11B-703.5.6) (ADA 703.5.6) pg. 376</p>
Parking - Does a ramp protrude into the access aisle?	Ramp protrudes into the parking area. 70 inches into parking.	<p>Access aisles shall not overlap the vehicular way. (CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p> <p>Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces or parking access aisles. Fig. 5 (CA T24 11B-406.5.1) (ADA 406.5) pg. 196</p>

4. Facility Location: 12625 Heacock, Moreno Valley, CA

Parking - Is there unauthorized parking signage at entrance to off-street accessible parking?	Two (2) Signs at entry to parking lot (across the street) missing information (tow co, phone number)	An additional sign shall be posted either in a conspicuous place at each entrance to an off-street parking facility OR immediately adjacent to on-site accessible parking and visible from each parking space. (CA T24 11B-502.8) pg.170
--	--	---

		<p>The additional sign shall not be less than 17" wide x 22" high. Fig. 4 (CA T24 11B-502.8.1) pg. 170</p> <p>The additional sign shall clearly state in letters with a min. height of 1" the following: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or special license plates issued for persons with disabilities will be towed away at the owner's expense. Towed vehicles may be reclaimed at: _____ or by telephoning _____." (CA T24 11B-502.8.2) pg. 170</p> <p>Blank spaces shall be filled in with appropriate information as a permanent part of the sign. (CA T24 11B-502.8.2) pg. 170</p>
Parking Access Aisles	<p>Walkway from street does not have appropriate access <u>aisle lines</u> painted on walkway.</p>	<p>The words "NO PARKING" shall be painted on the surface each access aisle. (CA T24 11B-502.3.3) pg. 176</p> <p>This notice shall be painted in white letters a min. of 12" in height and located to be visible from the adjacent vehicular way. (CA 11B-502.3.3) pg. 176</p> <p>Access aisles shall be marked with a blue painted borderline around their perimeter. (CA T24 11B-502.3.3) (ADA 502.3.3) pg. 176</p>

		<p>The area within the blue borderlines shall be marked with hatched lines a max. of 36" on center in a color contrasting with that of the aisle surface, preferably blue or white. (CA T24 11B-502.3.3) pg. 176</p>
Lobby Signage	Several Evacuation Plan signs are not in Threshold Language	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p> <p>Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379</p>
Interview Room - Signage	Room Signs (103, 105, 106, 109, 111, 112, 161, 172, 174, 175, 176, 177, 178, 179, 180, are NOT in Threshold Language.	<p>All instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking applicants/recipients shall be translated into appropriate languages. Such signs, or an additional sign, shall state that applicants/recipients may request aid or services in their primary language. (Div. 21-107.212)</p>

		Installation height above finished floor shall be 40" max. Please see Table 57-5. (CA T24 11B-703.5) (ADA 703.5) pg. 379
--	--	---

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify	yes			

Question	Yes	No	Some-times	Comments
a client's language need upon first contact? How?				
Does the county use a primary language form?	yes			
Does the client self-declare on this form?	yes			
Are non-English- or limited- English-speaking clients provided bilingual services?	yes			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	yes			
Is there a delay in providing services?		no		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	yes			
Are county interpreters determined to be competent?	yes			
Does the county have adequate interpreter services?	yes			
Does the county allow minors to be interpreters? If so, under what circumstances?		no		Riverside County has policy in place for minors <u>not to be</u> interpreters for their parents.
Does the county allow the client to provide his or her	yes			The County will allow and documentation is evident.

Question	Yes	No	Some-times	Comments
own interpreter?				
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	yes			
Does the county use the CDSS-translated forms in the clients' primary languages?	yes			
Is the information that is to be inserted into NOA translated into the client's primary language?	yes			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	yes			
Does the county identify a client with a disability (physical, mental, or learning)?	yes			
Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)?	yes			
Does the county identify and assist the client who				

Question	Yes	No	Some-times	Comments
has learning disabilities or a client who cannot read or write?	yes			
Does the county offer screening for learning disabilities?	yes			
Is there an established process for offering screening?	yes			
Is the client identified as having a learning disability referred for evaluation?	yes			

B. Corrective Actions

None

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children Services	Welfare to Work	Calworks	Calfresh
Ethnic origin documentation	Riverside County Department of Public Social Services is clearly identifying client Ethnicity	Riverside County Department of Public Social Services is clearly identifying client Ethnicity	Riverside County Department of Public Social Services is clearly identifying	Riverside County Department of Public Social Services is clearly identifying client Ethnicity

Documented Item	Children Services	Welfare to Work	Calworks	Calfresh
	on record	on record	client Ethnicity on record	on record
Primary language documentation	Riverside County Department of Public Social Services is clearly identifying a clients Primary Language on record	Riverside County Department of Public Social Services is clearly identifying a clients Primary Language on record	Riverside County Department of Public Social Services is clearly identifying a clients Primary Language on record	Riverside County Department of Public Social Services is clearly identifying a clients Primary Language on record
Method of providing bilingual services and documentation	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.
Client provided own interpreter	A client is advised on the usage of client provided interpreter and it is documented.	A client is advised on the usage of client provided interpreter and it is documented.	A client is advised on the usage of client provided interpreter and it is documented.	A client is advised on the usage of client provided interpreter and it is documented.
Method to inform client of potential problem using own interpreter	As a client is processed at intake they are advise as to the potential problems with the proving their own	As a client is processed at intake they are advise as to the potential problems with the proving their own	As a client is processed at intake they are advise as to the potential problems with the	As a client is processed at intake they are advise as to the potential problems with the proving their own

Documented Item	Children Services	Welfare to Work	Calworks	Calfresh
	interpreter and its documented.	interpreter and its documented.	proving their own interpreter and its documented.	interpreter and its documented.
Individual's acceptance or refusal of written material offered in primary language	When a client refuses written material offered in their language – it is documented.	When a client refuses written material offered in their language – it is documented.	When a client refuses written material offered in their language – it is documented.	When a client refuses written material offered in their language – it is documented.
Documentation of minor used as interpreter	If a minor is used as an interpreter – it is being documented.	If a minor is used as an interpreter – it is being documented.	If a minor is used as an interpreter – it is being documented.	If a minor is used as an interpreter – it is being documented.
Documentation of circumstances for using minor interpreter temporarily	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.
Method of identifying client's disability	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a

Documented Item	Children Services	Welfare to Work	Calworks	Calfresh
	client's disability.	disability.	client's disability.	client's disability.

B. Corrective Actions

None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	yes			They receive it at initial hire, and then every two years thereafter.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	yes			Through employee interviews it is very clear that employees are knowledgeable the rights and procedures of a client to file a discrimination complaint
Does the county provide employees Cultural Awareness Training?	yes			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	yes			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	yes			

B. Corrective Actions

None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	yes			Employees are able to distinguish between a program and a personnel complaint.
Did the employees know who the Civil Rights Coordinator is?	yes			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	yes			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	yes			
Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed?	yes			

B. Corrective Action:

None

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. No observations were submitted by the community organizations that were contacted.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Riverside County Department of Public Social Services Civil Rights Compliance Plan for the period January 1, 2016 – December 31, 2016, was received on September 1, 2016. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the Riverside County Department of Public Social Services staff warm, welcoming, informative and very supportive. Thanks to Nancy Chung, Civil Rights Coordinator for organizing the details of the review. Each District Office, staff was helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Riverside County Department of Public Social Services is in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Riverside County Department of Public Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.